

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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NORTHERN DIST. OF TX

2013 APR 17 PM 12:50

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J. Allen

ISRAEL GARCIA, JR., et al.,

Plaintiffs,

v.

JENKINS/BABB LLP, et al.,

Defendants.

Civil Action No. 3:11-CV-3171-N-BH

**MOTION FOR ENLARGEMENT OF TIME TO ANSWER DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

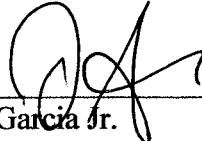
TO THE HONORABLE UNITED STATES MAGISTRATE JUDGE:

COMES NOW the Plaintiffs Israel Garcia Jr. and Melissa R. Garcia who request an enlargement of time to answer Defendants' Motion for Summary Judgment.

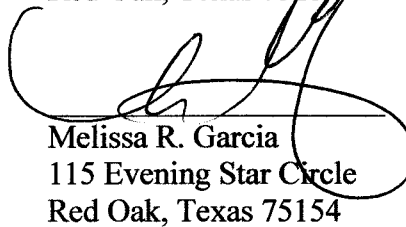
1. Plaintiffs request an additional 21 days to respond to Defendants' Motion for Summary Judgment filed on March 28, 2013.
2. Plaintiffs require additional time due to Defendants council failure to serve Motion for Summary Judgment to the Plaintiff.
3. Plaintiffs finally received the Motion for Summary Judgment on April 13, 2013 and have 5 days to respond.
4. Plaintiffs are not represented by counsell and do not have the luxury of having a staff with paralegals and employees as an attorney or law firm does to make the response in a timely manner.

WHEREFORE, the Plaintiffs request this Honorable Court grant an additional 21 days to answer Defendants' Motion for Summary Judgment.

Respectfully Submitted,



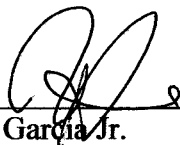
Israel Garcia Jr.
115 Evening Star Circle
Red Oak, Texas 75154



Melissa R. Garcia
115 Evening Star Circle
Red Oak, Texas 75154

CERTIFICATE OF SERVICE

The undersigned certifies that on this 18 day of April 2013 a true and correct copy of the foregoing document was mailed by USPS first class mail to the parties below:


Israel Garcia Jr.

Keith Wier
Bush & Ramirez LLC
5615 Kirby Drive, Suite 900
Houston, Texas 77005

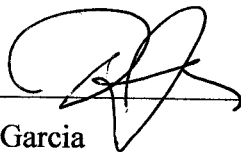
Robert E. Jenkins
JENKINS | BABB LLP
2727 Lyndon B Johnson Fwy #900
Dallas, TX 75234

Michael Jason Babb
JENKINS | BABB LLP
2727 Lyndon B Johnson Fwy #900
Dallas, TX 75234

Certificate of Conference

As required by LR 7.1(a) I certify that I have conferred, or made a reasonable attempt to confer, with all other parties which are listed below about the merits of this Motion with the following results:

Plaintiff Israel Garcia Jr. contacted Defense council by phone and there were no objections.



Israel Garcia